

# **Exhibit A**

**From:** [Chris Bryant](#)  
**To:** [Hollingsworth, Jennifer J.](#)  
**Cc:** [Colarusso, Gina](#)  
**Subject:** Chat re Legislative Privilege  
**Date:** Wednesday, February 2, 2022 3:34:07 PM

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External E-mail

Jennifer,

I wanted to check and see whether you'd had a chance to talk with your folks about any of the legislative privilege issues that we had a chance to talk about briefly this morning. Our views on the scope of legislative privilege may be a bit too far apart to come to a consensus on all issues (namely, it is our position that there are nonpublic communications/maps/documents responsive to our RFPs that are not covered by legislative privilege in the context of this redistricting litigation and that the same would apply to topics/interactions likely to arise in the depositions of Patrick Dennis and the legislative witnesses). Unless you let me know otherwise, we'll assume that the House Defendants' position on the scope of legislative privilege is set in stone and ask the court to provide some clarity in a motion later this afternoon/evening.

To the extent that there's any update in timelines for a preliminary/rolling/final privilege log or any additional information that you can share regarding the asserted privilege, please let me know. I've got a brief window between 3:45 and 4:00 to hop on a call and then will be free again after 4:45.

Chris



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